



Brooke Leondar  
713-752-4371 (Direct Dial)  
713-308-4171 (Direct Fax)  
bleondar@jw.com

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*Via Email byron\_thomas@txs.uscourts.gov*

Mr. Byron Thomas  
Case Manager to Judge Vanessa D. Gilmore  
United States Courthouse  
515 Rusk Ave., Room 5300  
Houston, Texas 77002

Re: *Tam Hoang v. Microsemi Corporation and Microchip Technology Incorporated*;  
Civil Action No. 4:19-cv-01971; In the United States District Court for the Southern  
District of Texas, Houston Division

Dear Judge Gilmore:

Pursuant to your rules, on behalf of Plaintiff, Tam Hoang, I am requesting a hearing regarding a discovery dispute. Plaintiff, who is Vietnamese, alleges Defendants used a layoff to terminate him and another older Vietnamese employee. Plaintiff alleges race, national origin, and age discrimination. David Sheffield was the decision-maker.

Plaintiff's Interrogatory No. 15 to Defendants<sup>1</sup> requested information on Microsemi employees reporting directly or indirectly, to Sheffield in 2017 or 2018 so Plaintiff could conduct a statistical analysis of the information. Defendants previously produced an organizational chart showing 30 employees who reported to Sheffield.<sup>2</sup> Defendants, however, answered Interrogatory No. 15 as to only 19 employees. Defendants contend the information on the remaining 11 employees is irrelevant because they are Indian citizens with no standing to bring a claim. However, the issue to be determined is Sheffield's discriminatory motive against those under his supervision, not that of standing. In fact Sheffield conducted a comprehensive analysis of Arvind Chandrasekaran, one of the 11 Indian employees, during the reduction in force selection process, making this employee's information all the more important. The information requested is needed for Mr. Hoang's statistical expert's review. Thus, Hoang requests the Court order production of the information of the remaining employees who reported to David Sheffield within five business days.

Sincerely,

A handwritten signature in dark ink that reads 'Brooke Leondar'. The signature is fluid and cursive, with the first and last names being clearly legible.

Brooke Leondar

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<sup>1</sup> See Exhibit A, Plaintiff Tam Hoang's Interrogatory No. 15 to Defendant Microsemi Corporation.

<sup>2</sup> See Exhibit B, 2017 Microsemi Organizational Chart.

BAL/ad

cc: Carolyn Russell, Esq. (Via Email carolyn.russell@odnss.com,  
Devin S. Vasquez, Esq. Mark.kisicki@ogletree.com, and  
Mark G. Kisicki, Esq. devin.vasquez@odnss.com)  
Ogletree, Deakins, Nash,  
Smoak & Stewart, P.C.

Ltr-judge 01